



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 7
25 FUNSTON ROAD
KANSAS CITY, KANSAS 66115

MEMORANDUM

SUBJECT: Transmittal of Inspection Report - RCRA

FROM: Robert B. Dona *RB Dona*
Chief, Field Investigations Section, EMCM/ENSV

TO: Michael Sanderson
Chief, RCRA/WSTM

This memorandum transmits the following compliance monitoring inspection report performed by the Field Investigations Section, Environmental Monitoring and Compliance Branch, Environmental Services Division.

<u>Facility</u>	<u>EPA ID Number</u>	<u>Activity No.</u>	<u>Areas of Non-Compliance</u>
Square D Corp. Cedar Rapids, IA	IAD000819110	AWF38	1. Manifest 5 digit number 2. Personnel Training 3. Hazardous Waste Determination

Attachments

RCRA



545160

RECEIVED

JUN 30 1985

USEPA, RCRA Branch

REPORT OF RCRA COMPLIANCE INSPECTION

AT

SQUARE D COMPANY
3700 6th St. S.W.
Cedar Rapids, Ia 52404

EPA ID Number: IAD000819110

BY

U.S. ENVIRONMENTAL PROTECTION AGENCY
Region VII
Environmental Services Division

INTRODUCTION

At the request of the Waste Management Division (WSTM), a RCRA compliance evaluation inspection was performed at Square D Company, Cedar Rapids, Iowa on May 22, 1986. The inspection was conducted under the authority of Section 3007 of the Resource Conservation and Recovery Act (RCRA), as amended. This narrative report and attachments present the results of the inspection.

PARTICIPANTS

Square D Company (Square D):
Carl Ashley, Plant Manager
Kyle Chown, Plant Superintendent
Jim Jensen, Environmental Coordinator
Richard Kelly, Traffic Manager
Phil Nelson, Loss Control Supervisor

U.S. Environmental Protection Agency (EPA):
David N. Whiting, Environmental Engineer

INSPECTION PROCEDURE

After arriving at Square D and contacting Mr. Jensen, Mr. Jensen informed the inspector a pre-inspection meeting would be held with the assembled, above mentioned participants. At the pre-inspection interview, the inspector presented his credentials to Messrs. Ashley, Chown, and Jensen. The purpose and procedure of the inspection were explained and the confidentiality of business information was discussed. The inspection consisted of a discussion of operations, wastes generated, waste management practices, a review of pertinent documents, and a tour of the facility. Compliance information was supplied by Messrs. Jensen, Kelly, Nelson and Chown. A tour of the facility was conducted by Messrs. Jensen, Nelson and Chown. At the conclusion of the inspection an exit interview was held with Messrs. Jensen, Nelson and Chown. At the end of the exit interview, Mr. Chown

acknowledged receipt of the following by his signature: a Notice of Violation a RCRA Inspection Confidentiality Notice form, a Request for Confidential Treatment of Information form and a Receipt for Documents (attachments 1-3).

FACILITY AND PROCESS DESCRIPTION

Square D manufactures molded case circuit breakers. The circuit breakers are for industrial and power circuit breaker use. The standard industrial classification number for this type of manufacture is 3613. There are basically 3 areas of operations at this Square D plant: molding, fabrication and assembly. Included in the molding division is spray painting the interior parts of molded plastic circuit breaker cases with a dielectric paint. All molded circuit breaker cases are made of thermal set plastic. The painting occurs in two dry filter paint spray booths. The fabrication operations include: plating, machining operations, and brazing. Plating at Square D is for deposition of zinc, nickel, or silver. Waste water from plating operations is treated at the plant. Discharge of wastewater treatment effluent to the City sanitary sewer is under a formal pretreatment agreement, permit number 85-50 (attachment 4). Wastewater treatment unit operations include: equalization holding, clarification, chrome reduction (with sodium bisulfite), cyanide destruction (with chlorine) and sludge dewatering in a filter press. Fabrication also includes the contact manufacturing area. Contact manufacturing is by punch-press operations and plating. The assembly area assembles parts manufactured for circuit breakers. Ancillary support operations at Square D include engineering, warehousing, and storage.

Approximately 700 employees work at Square D. Approximately 400 employees are salaried. Molding operations work three shifts per day, as does contact manufacturing. The other areas of the plant work two shifts per day, 5 days per week. Square D is housed in a 222,000 square foot building. The building is protected throughout by a zoned, heat-activated, wet sprinkler system. Square D has a water tower for supply of fire fighting water and the water tower is fed and filled with city water.

FINDINGS AND OBSERVATIONS

Wastes

The plating area and the associated wastewater treatment, generate approximately 10 cubic yards per quarter year of EPA number F006 wastewater treatment sludge (attachment 5). Reportedly, all plating wastes are discharged to the Square D wastewater treatment plant and treated prior to discharge to the sanitary sewer. The plating wastewater treatment sludge is accumulated in 1.1 cubic yard "super-sacks". The accumulated sludge is sent to Peoria Disposal Company, EPA ID number ILD00805812.

Waste xylene from gun and line cleaning at the spray paint booth amounts to approximately 165 gallons each quarter year. The waste xylene is predominantly generated on a batch basis from a determination of in-process cleaning solvent

to be no longer adequate for cleaning purposes. The xylene contents of cleaning equipment tanks are then transferred into 55-gallon containers. Spent xylene is shipped off-site to Hydrite Chemical Co., EPA ID number IAT200010593.

Approximately 600 pounds a month of waste mineral spirits naptha are generated in parts washers used throughout various departments at Square D. The parts washers are equipment leased to Square D by Safety-Kleen Corp. Every 2 weeks Safety-Kleen removes the inprocess solvent and replaces it with clean solvent. The waste solvent is transported by the Safety-Kleen Branch office in Davenport, Iowa, EPA ID number IAD098027592. The waste mineral spirits naptha is manifested as EPA waste number D001.

Square D has one vapor degreaser which uses 1,1,1-trichloroethane (1,1,1). Approximately 110 gallons of waste 1,1,1 are generated each quarter year. The waste 1,1,1 is recycled by Hydrite Chemical Co.

262.11
(c)

Paint filters generated as waste by Square D total approximately 11 filters per month. The filters are approximately 18 inches by two feet in size. The filters are added to the general trash which goes to the Cedar Rapids Sanitary Landfill (SLF), permit number 1-SDP-54P-74. There has been no hazardous waste determination by Square D on the paint filters prior to disposal. Upon discussing the situation with the representatives at Square D, it was determined the paint used for dielectric coating probably has no heavy metal pigments (attachment 6). In addition, there have been reportedly no problems of spontaneous combustion with the present method of filter disposal. The representatives of Square D were informed there should be a hazardous waste determination and this would be best served by having an analysis performed for characteristics of hazardous waste.

Waste oil generated by Square D amounts to approximately 110 gallons per month. The waste oil is picked up by A/A-Pierce Oil Company of Rock Island, Il. Mr. Jensen said the waste oil was sent by A/A-Pierce Oil Co. to Marco Oil Company in Dalton, Il for re-refining.

General trash including paper, cardboard, plastic and some off-specification plastic parts are accumulated in two roll-off boxes. One roll-off box is cylindrical, has a capacity of approximately 30 cubic yards and has a hydraulic compactor attachment. The cylindrical roll-off box is transported to the SLF one time per week. A second, rectangular roll-off box is also used. The rectangular roll-off box is transported to the SLF two times per month.

Engineering uses two computer aided design printing machines for detailed specification print making. The printing fluid and the cleaning fluid used in the printing machines is accumulated from cleanings and amounts to approximately 500 lbs. per year. The printing waste is manifested as EPA hazardous waste number F003 and is disposed of by Hydrite Chemical Co.

Brazing operations used at Square D do not have any associated air particulate collection equipment. Brazing emissions are emitted to the ambient atmosphere in the plant.

The silver stripping (sulfuric acid) solution formerly used at Square D has been discontinued (attachment 11). Silver parts that need stripping are sent to American Chemical and Refining, a division of Handy and Harmon, Fairfield, CT, EPA ID number CTD018656819. The last off-site shipment of waste sulfuric acid stripping solution was in January of 1986.

Manifests

262.20
(a)

The manifest system and filing in use by Square D appears adequate to ensure proper manifesting and retention of record. Representative manifests are included in Attachment 7. The manifests did not include a unique five digit hazardous waste manifest number. Many manifests had only a three digit number and some manifests had a 6 or 7 digit number. In addition to the manifest documents themselves, Square D is using a hazardous waste manifests log which identifies: manifest document numbers, the date of shipment, the description of the waste, the quantity, the transporter, the disposal facility and the date on which a signed return manifest from the designated facility was received (attachment 8).

The biennial report submitted by Square D for 1985 activities was sent to EPA about February of 1986. The biennial hazardous waste report identified the following waste generated in the following quantities:

<u>EPA Hazardous Waste No.</u>	<u>Quantity</u>
F006	23 tons shipped and 8 tons on site as of 12/31/85
D002(silver solution)	1820 lbs.
F003(waste zylene)	6,500 lbs.
F001(1,1,1)	45,000 lbs.
F003(printing waste)	500 lbs.
D001 (waste mineral spirits naptha)	3,330 lbs.

Storage

Square D uses two storages areas for hazardous waste storage under 90 days. The sacks of accumulated of F006 sludge are kept on pallets in an area known as the "bowling alley". Photographs of this area storage were taken (attachment 12). The waste flammable xylene and printing waste is stored in the flammable liquids storage vault. All large containers of flammable liquids are grounded in this special enclosure. There was no waste 1,1,1 in storage at the time of the inspection; reportedly, waste 1,1,1 is stored in the "bowling alley". Waste mineral spirits naptha is in process until it is picked up by Safety-Kleen.

Personnel Training

Square D has a personnel training program which includes a written description of the initial and ongoing training an employee would receive (attachment 9).

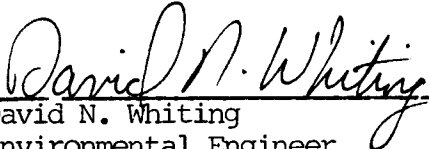
265.16
(d) (1)

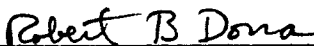
The personnel training records also include documentation of training (attachment 10), job title and job description. The personnel training program does not include a list of people holding the jobs Square D has identified as needing hazardous waste training. It was explained by Mr. Chown that the responsibility for identifying which personnel need the training and which were present at the training sessions, was the responsibility of the various department supervisors. Personnel involved with hazardous waste management at Square D are in the following departments: maintenance, shipping-receiving, plating-wastewater treatment and boiler fire watchman. Square D has a union for employees and bumping in job positions does occur. The accountability to ensure that new employees in a job position received training, being contingent upon the department supervisor identifying that situation, is all verbal. There is no written procedure at Square D which identifies this accountability process. It was pointed out to the representatives at Square D they need a list of the employees names who are required to have training and that list should be reviewed once every six months to ensure compliance with training requirements under RCRA.

Preparedness/Prevention and Contingency Plan

The preparedness/prevention procedures implemented by Square D have been extensive and contacts have been made with emergency response groups. Square D has a company doctor who has his own clinic and a plant nurse on duty one shift per day. The ambulance service (out of St. Luke's Hospital in Cedar Rapids) has been contacted and would receive instructions by "runners" to the proper location if any emergency pick-up were needed.

The contingency plan on file at Square D has been maintained and is up to date. The contingency plan describes the emergency response activities, a description of emergency response equipment, a description of its location and also contains an evacuation plan.


David N. Whiting
Environmental Engineer
Date: 6/23/86
Activity No. AWF38


Robert B. Dona
Chief, Field Investigations Service
Date: 6-26-86

Attachments

1. Notice of Violation
2. RCRA Inspection Confidentiality (3 pages)
3. Receipt for Documents
4. Industrial Waste Discharge Permit (4 pages)
5. Sludge Analysis (2 pages)
6. Dielectric Coating Formulation
7. Manifests (4 pages)
8. Operating Record (2 pages)
9. Personnel Training Plan (3 pages)
10. Training Documentation (2 pages)
11. Generator Biennial Hazardous Waste Report for 1985, pg. 9 of 9
12. Photographs
13. Inspection Checklists (9 pages)

**Notice of Violation Pursuant to Requirements
of the Resource Conservation and Recovery Act (RCRA)**

TO: Facility Name: Square D Company
Address: 700 East Street S.W.
Corvallis, Oregon 97331
EPA ID Number: TAD000819110 Date: 5/22/86

During an inspection just completed to determine compliance with the requirements of Subtitle C of RCRA and regulations promulgated pursuant thereto, the following violations were identified:

Citation	Description of Violation
40 CFR 262.20(a)	No unique 5 digit number used
40 CFR 262.11(c)(1)	No list of names of people in charge
40 CFR 262.11(c)	Paint filter not tested in 10 days

This notice is provided to call your attention to those areas of noncompliance at the earliest possible time. This notice does not constitute a compliance order (Administrative Civil Complaint) issued pursuant to Section 3008 of RCRA and may not be a complete listing of all violations which may be identified as a result of this inspection.

The Square D Company is hereby requested to submit in writing within 10 days of receipt of this notice a description of all corrective actions taken and/or a schedule for completion of necessary correction actions to be taken to: Mr. J. J. [unclear], Chief, RCRA Branch, U. S. Environmental Protection Agency, Region VII, 726 Minnesota Ave., Kansas City, Kansas, 66101. The corrective actions taken by Mr. [unclear] will be considered in subsequent enforcement follow-up. Should civil penalties be assessed, corrective action(s) will be considered in assessing the penalty amount.

If you have any questions on this Notice or wish to discuss your response, you may call David Doyle (U. S. EPA) at 913-236-2981, or [unclear], at Don Sandifer.

This Notice prepared by Don J. M. Whiting Date: 5/22/86

The undersigned person hereby acknowledges that he/she has received a copy of this Notice and has read same.

Printed Name: [unclear] Date: 5/22/86
Signature: [unclear]
Title: [unclear]

**Notice of Violation Pursuant to Requirements
of the Resource Conservation and Recovery Act (RCRA)**

TO: Facility Name: _____
Address: _____

EPA ID Number: T45000257110 Date: 1/22/86

During an inspection just completed to determine compliance with the requirements of Subtitle C of RCRA and regulations promulgated pursuant thereto, the following violations were identified:

Citation

Description of Violation

4678. 2. 1. 1
 4679. 2. 1. 1
 4680. 2. 1. 1
 4681. 2. 1. 1
 4682. 2. 1. 1
 4683. 2. 1. 1
 4684. 2. 1. 1
 4685. 2. 1. 1
 4686. 2. 1. 1
 4687. 2. 1. 1
 4688. 2. 1. 1
 4689. 2. 1. 1
 4690. 2. 1. 1
 4691. 2. 1. 1
 4692. 2. 1. 1
 4693. 2. 1. 1
 4694. 2. 1. 1
 4695. 2. 1. 1
 4696. 2. 1. 1
 4697. 2. 1. 1
 4698. 2. 1. 1
 4699. 2. 1. 1
 4700. 2. 1. 1

This notice is provided to call your attention to those areas of noncompliance at the earliest possible time. This notice does not constitute a compliance order (Administrative Civil Complaint) issued pursuant to Section 3008 of RCRA and may not be a complete listing of all violations which may be identified as a result of this inspection.

The _____ is hereby requested to submit in writing within 10 days of receipt of this notice a description of all corrective actions taken and/or a schedule for completion of necessary correction actions to be taken to: _____, Chief, RCRA Branch, U. S. Environmental Protection Agency, Region VII, 726 Minnesota Ave., Kansas City, Kansas, 66101. The corrective actions taken by _____ will be considered in subsequent enforcement follow-up. Should civil penalties be assessed, corrective action(s) will be considered in assessing the penalty amount.

If you have any questions on this Notice or wish to discuss your response, you may call _____ (U. S. EPA) at _____, or _____, at _____.

This Notice prepared by John M. White Date: 5/22/96

The undersigned person hereby acknowledges that he/she has received a copy of this Notice and has read same.

Printed Name: _____ Date: _____

Signature: _____

Title: _____

U.S. ENVIRONMENTAL PROTECTION AGENCY
726 Minnesota Avenue
KANSAS CITY, Kansas 66101

REQUEST FOR CONFIDENTIAL
TREATMENT

Name of Individual <i>Kyle Chown</i>	Title <i>Pl. & Superintendent</i>	Date <i>5/22/86</i>
Firm Name <i>Square D Company</i>	Firm Address <i>700 Cedar Rapids IA 52406</i>	City, State, & Zip <i>IA 52406</i>

Information for which Confidential Treatment is requested:

None requested at the time of inspection.

Acknowledgement of Claimant

The undersigned requests that confidential treatment of the information described be provided in accordance with provisions of the Freedom of Information Act (FOIA), 5U.S.C.552; EPA regulations issued thereunder, 40 CFR Part 2; and the Resource Conservation and Recovery Act (RCRA), Section 3007. The undersigned further acknowledges that he/she is authorized to make such claims for his/her firm.

The undersigned also certifies that each item described above meets all of the following criteria: (1) The company has taken measures to protect the confidentiality of the information, and it intends to continue to take such measures; (2) The information is not, and has not been, reasonably attainable without the company's consent by other persons (other than governmental bodies) by use of legitimate means (other than discovery based on a showing of special need in a judicial or quasi-judicial proceeding; (3) The information is not publicly available elsewhere; and (4) Disclosure of the information would cause substantial harm to the company's competitive position.

Signature (Owner, Operator, or Agent) <i>[Signature]</i>	Title <i>[Signature]</i>
Name of Inspector <i>David N. Whiting</i>	Inspector's Signature <i>David N. Whiting</i>

**U.S. ENVIRONMENTAL PROTECTION AGENCY
RCRA INSPECTION
CONFIDENTIALITY NOTICE**

Name and Address of Inspector(s) David N Whiting U.S. EPA, Region VII IA - RCRA Fed. Bldg. Rm 765 210 Wanlut Street Des Moines, IA 50309	Name and Address of Facility Square S Company 3700 Smith St. + SW. Cedar Rapids IA 52406 Owner, Operator, or Agent in Charge Kyle Cheson Title Plant Superintendent Address same as above	
Name of Individual to Whom Notice Given Kyle Cheson	Title Plant Superintendent	Date 5/22/86

It is possible that EPA will receive public requests for release of the information obtained during inspection of the facility above. Such requests will be handled by EPA in accordance with provisions of the Freedom of Information Act (FOIA), 5 U.S.C. 552; EPA regulations issued thereunder, 40 CFR Part 2; and the Resource Conservation and Recovery Act, Section 3007. EPA is required to make inspection data available in response to FOIA requests, unless the Administrator of the Agency determines that the data contains information entitled to confidential treatment.

Any or all of the information collected by EPA during the inspection may be claimed confidential, if it relates to trade secrets or commercial of financial matters that you consider to be confidential. If you make claims of confidentiality, EPA will disclose the information only to the extent, and by the means of the procedures set forth in the regulations (cited above) governing EPA's treatment of confidential information. Among other things, the regulations require that the EPA notify you in advance of publicly disclosing any information you have claimed and certified confidential.

To claim information confidential, you must certify that each claimed item meets all of the following criteria:

1. Your company has taken measures to protect the confidentiality of the information, and it intends to continue to take such measures.
2. The information is not, and has not been, reasonably obtainable without your company's consent by other persons (other than governmental bodies) by use of legitimate means (other than discovery based on a showing of special need in a judicial or quasi-judicial proceeding).
3. The information is not publicly available elsewhere.
4. Disclosure of the information would cause substantial harm to your company's competitive position.

At the completion of the inspection, you will be given a receipt for all documents, samples, and other materials collected. At that time you may make claims that some or all of the information is confidential and meets the four criteria listed above.

RCRA INSPECTION CONFIDENTIALITY NOTICE	Facility <i>Square D Company</i>
--	-------------------------------------

If you are not authorized by your company to make confidentiality claims, this notice will be sent by certified mail, along with the receipt for documents, samples, and other materials, to the Owner, Operator, or Agent in Charge of your firm, within two days of this date. That person must return a statement, specifying any information which should receive confidential treatment.

This statement from the Owner, Operator, or Agent in Charge should be addressed to:

Mr. David A. Wagoner
Director, Air and Waste Management Division
United States Environmental Protection Agency
726 Minnesota Avenue
Kansas City, Kansas 66101

and mailed by registered, return-receipt requested mail with in seven (7) calendar days of receipt of this Notice.

Failure by your firm to submit a written request that information be treated as confidential, either at the completion of the inspection or by the Owner, Operator, or Agent in charge, within the seven-day period, will be treated by the EPA as a waiver by your company of any claims for confidentiality regarding the inspection data.

To be completed by the facility official receiving this Notice:

I have received and read this Notice.

Name

Title

Signature

Date

If there is no one on the premises of the facility who is authorized to make business confidentiality claims for the firm, a copy of this Notice and other inspection materials will be sent to the Owner, Operator, or Agent in charge of the company. If there is another company official who should also receive this information, please designate below:

Name

Title

Address

U.S. ENVIRONMENTAL PROTECTION AGENCY

RECEIPT FOR SAMPLES AND DOCUMENTS

Inspector(s) Name and Address David N Whiting U. S. EPA, Region VII IA - RCRA Fed. Bldg. Rm 765 210 Walnut St Des Moines, IA 50309		Firm Name and Address Square D Company 3700 S. 1st St. S.W. Colorado Springs IA 52406
		Name of Individual Kyle Chown
		Title Plant Superintendent
Date Collected 5/22/86	Samples were: <input type="checkbox"/> Purchased <input type="checkbox"/> Received no charge <input type="checkbox"/> Borrowed	
Sample Numbers		Amount paid for Samples
Duplicate Samples Requested <input type="checkbox"/> Yes <input type="checkbox"/> No		Method of Payment <input type="checkbox"/> Cash <input type="checkbox"/> Voucher <input type="checkbox"/> To be Billed

The documents and samples of chemical substances and/or mixtures described below were collected in connection with the administration and enforcement of the Resource Conservation and Recovery Act.

Receipt for the document(s) and/or Sample(s) described below is hereby acknowledged:

- 1) Personnel training documentation (2 pages)
- 2) Sludge (FOOG) analysis (2 pages)
- 3) Waste minimization report - from granite business report
- 4) City of C.R. - restricted waste discharge permit (4 pages)
- 5) 4 manifests - 4/30/86, 4/10/86, 1/02/86, 1/29/86
- 6) Heavy equipment manifest log (2 pages)
- 7) Personnel training plan (3 pages)
- 8) Duplicating paint composition

Signature (Owner, Operator, or Agent) Kyle Chown		Title Plant Superintendent
Name of Inspector David N. Whiting	Title Env. Eng.	Inspector's Signature David N. Whiting

CITY OF CEDAR RAPIDS
INDUSTRIAL WASTE DISCHARGE PERMIT

PERMITTEE: SQUARE D COMPANY

FACILITY ADDRESS: 3700 Sixth Street, S.W.
Cedar Rapids, IA 52404

PHONE: 319 365 4631

DISCHARGE LOCATION: 3700 Sixth Street, S.W.

PERMIT NO.: 85-50

DATE OF ISSUANCE: February 1, 1985

DATE OF EXPIRATION: January 31, 1988

You are required to file an application for renewal of
this permit by: December 31, 1987

STANDARD INDUSTRIAL CLASSIFICATION CODE: 3613,
Manufacturing, Switchgear and Switchgear Apparatus

FEDERAL CATEGORICAL PRETREATMENT STANDARDS APPLICABLE:
Metal Finishing Point Source Category

PERMIT CLASS: II

USER GROUP II

PERMIT SURCHARGE FACTOR: 1.0

Pursuant to the authority of Chapter 13 of the Municipal Code of the City of Cedar Rapids, Iowa, this permit is issued for the discharge of wastewater from the facility cited above to the sanitary sewer system. You are authorized to discharge the pollutants specified in this permit in accordance with the limitations and conditions set forth in this permit.

GENERAL CONDITIONS

1. You are required to report any changes in conditions or information stated in your permit application that will affect the character or volume of the waste discharge. Facility expansions, production increases, or process modifications which will result in new or increased discharge of pollutants must be reported in advance to the Water Pollution Control Facilities Director. If such discharge will exceed the discharge limits set out in this permit, you must file a new permit application ninety days in advance.
2. The Water Pollution Control Facilities Director may change the terms and conditions of this permit, including the average or maximum limits on the elements of wastewater strength, from time to time as circumstances may require. You will be allowed a reasonable time to comply with any required changes in the permit, except that a change in average or maximum limits of wastewater strength shall immediately affect the calculation of the sewage service charge.
3. This permit is expressly subject to all provisions of Chapter 13 of the Municipal Code and all rates and charges established by the City, and may be terminated for violation of provisions of the Code or the terms and conditions set out herein. Issuance of this permit does not relieve you of responsibility to comply with all local, state, and federal laws, ordinances, regulations, and other legal requirements applying to the operation of your facility.
4. This permit shall not be assigned or transferred.

FACILITIES AND RECORDS MAINTENANCE

You are required to maintain all pretreatment and waste monitoring facilities continuously in satisfactory and effective operation, at your expense. You shall maintain operation records, including any reports of laboratory analysis, flow and pH observations, and instrument chart recordings for a period of at least one year. Such facilities and records shall be subject to and made available for periodic inspection by the city.

DISCHARGE LIMITATIONS

	CONCENTRATION in mg/l* (unless otherwise specified)		MASS in lbs/day* (unless otherwise specified)	
	AVERAGE	MAXIMUM	AVERAGE	MAXIMUM
FLOW (gallons/work day)			40000	60000
Cadmium	0.27	0.69	0.09	0.23
Hexavalent Chromium	0.43	0.69	0.14	0.23
Total chromium	1.71	2.77	0.57	0.92
Copper	2.07	3.38	0.69	1.13
Lead	0.43	0.69	0.14	0.23
Nickel	2.38	3.98	0.79	1.33
Silver	0.24	0.43	0.08	0.14
Zinc	1.48	2.61	0.49	0.87
Total Cyanide	0.65	1.20	0.22	0.40
Total Toxic Organics (TTO)**		4.57		1.52
pH: target level 7 to 9; minimum 6.5 at any time				

*These limits apply to the segregated plating shop waste stream, prior to mixing with other plant waste.

**Interim Limit for TTO

MAXIMUM means the maximum for any 1 day.

AVERAGE means the average of daily values for four consecutive monitoring days

SPILL AND OVERLOAD REPORTING

You are required to immediately notify the Director of the Water Pollution Control Facilities in the event of an accident, negligence, or other occurrence that occasions discharge into the city sewer system of any liquid, gaseous, or solid material prohibited by Section 13.07 of the Municipal Code, or spill or slug quantities of any pollutants limited by this permit. The Director shall be given advance notification when a known or forecast extraordinary situation could subsequently result in discharge of quantities greater than the MAXIMUM limits. Such notifications shall not relieve you of responsibility for expense, loss or damage occasioned by the City by reason of such discharges.

SELF MONITORING

You are required to monitor the pH and the flow volume of the segregated plating shop waste stream and to report the monitoring results to the Water Pollution Control Facilities. The high and the low pH and the 24-hour flow shall be recorded for each day the plant is in operation. Reports shall be prepared for each calendar month and submitted by the fifteenth day of the following month. Reports shall list or identify: (1) the facility, (2) the name and title of the preparer, (3) the month and year, (4) each daily flow and pH range recorded, (5) the average daily flow, (6) the maximum daily flow and the minimum pH recorded during the month.

COMPLIANCE SCHEDULE

You have identified metal finishing, including electroplating, as manufacturing activities carried out in your plant. The terms of the Environmental Protection Agency General Pretreatment Regulations, 40 CFR Part 403 require that the Water Pollution Control Facilities conduct a program for controlling the introduction of industrial waste into the treatment works, and an attendant regulation, 40 CFR Part 433 establishes categorical pretreatment standards for your plant's point source category.

Accordingly, you are required to meet the requirements set out in categorical pretreatment standards for total toxic organics (TTO). The discharge limitation for TTO is 2.13 mg/l Maximum for any 1 day. The compliance deadline for meeting the TTO limitation will be February 15, 1986

Your permit will be amended to incorporate the TTO limitation on or before the compliance deadline.

For the CITY of CEDAR RAPIDS, IOWA
WATER POLLUTION CONTROL FACILITIES

By: _____

George W. Milligan
George W. Milligan, WPCF Director

Date: _____

2-1-85

P.D.C. LABORATORIES, INC.
INDUSTRIAL WASTE ANALYTICAL SERVICES

1113 N. SWORDS AVENUE
PEORIA, ILLINOIS 61604

(309) 676-4893

ANALYTICAL REPORT FORM:

To: Square D Co.- IA Date Collected -- Date of Report 5/5/86
3700 6th St. S.W. Sampled By -- Sample# 6P-055
Cedar Rapids, IA 52405 Date Received 3/24/86 PDC# --
(319) 365-4631 Date Completed 4/28/86 Permit# --
Attn: Jim Jensen P.O.# --

Waste Stream Metal hydroxide sludge
Physical Appearance: Odor -- Color green Paint Filter passed
Physical State solid Number of Phases -- Water Reactivity none
Water Miscibility not water soluble Load Bearing Capacity -- tons/sq.ft.
pH -- (neat); 8.49 (10% solution) Phase solid Solids 25.6 %
Flashpoint >200°F Acidity -- % Alkalinity -- %

Analysis Parameters

Parameters	Total (mg/kg)	EP Toxicity (mg/l)	EPA Code	EP Limit (mg/l)
Arsenic		<0.005	D004	5.0
Barium		6.52	D005	100.0
Cadmium		1.10	D006	1.0
Chromium tot		<0.25	D007	5.0
Lead		<0.50	D008	5.0
Mercury		<0.0005	D009	0.2
Selenium		<0.01	D010	1.0
Silver		0.05	D011	5.0
Cyanide	11.8			
Phenol	<5.0			
Sulfide	<0.5			
EOX				
BTU/lb.				
Cyanide Reactive	<0.9			
Sulfide Reactive	<0.5			

< = less than > = greater than

Note 1: All analysis are conducted utilizing recommended USEPA and IEPA Methods.

Note 2: The paint filter and load bearing capacity tests are run according to Illinois Pollution Control Board (6/84) Section 729.320/321

John Davis
Laboratory Manager



Sanitary Engineering Laboratories, Inc.
1922 Main Street, P.O. Box 625
Cedar Falls, Iowa 50613
Phone: (319) 277-2401



Sludge Analysis

Client: Square D Corporation
Attn: Mr. Jim Jensen
3700 6th Avenue, SW
Cedar Rapids, IA 52406

Date Sampled: 12/18/85

Date Received: 12/19/85

Sample Identity: Plating Sludge

Analysis

	<u>As Received</u>	
Volatile Solids (@ 100°C)	73.17	%
Volatile Solids (@ 600°C)	7.50	%
pH	9.2	S.U.
Specific Gravity	0.849	
Moisture	73.17	%
Total Solids	26.83	%
Total Cyanide (as CN)	180	mg/kg
Total Sulfide (as S)	<9	mg/kg
Leachable Sulfide (as S)	<1	mg/l
Leachable Cyanide (as CN)	0.02	mg/l
	<u>Dry Weight Basis</u>	
Copper (as Cu)	3,560	mg/kg
Zinc (as Zn)	25,400	mg/kg
Magnesium (as Mg)	2,160	mg/kg
Chromium (as Cr)	1,900	mg/kg
Iron (as Fe)	950	mg/kg
Calcium (as Ca)	27,300	mg/kg
Nickel (as Ni)	34,100	mg/kg
Tin (as Sn)	60	mg/kg
Arsenic (as As)	5.0	mg/kg
Barium (as Ba)	30	mg/kg
Cadmium (as Cd)	15	mg/kg
Lead (as Pb)	45	mg/kg
Mercury (as Hg)	<0.5	mg/kg
Silver (as Ag)	18	mg/kg
Selenium (as Se)	0.90	mg/kg

< means less than

ppm = mg/kg

January 15, 1986
nh 1318A
#5-11329

Prepared and Submitted by
SERCO Laboratories

Diane E. Moles
Diane E. Moles
Laboratory Supervisor

Magnesium Silicate	226 lbs.
Montmorillonite Special	2 lbs.
Methyl Alcohol	0.7 lbs.
Carbon Black	20 lbs.
Calcium Carbonate	282 lbs.
Beckosol 1303-50	228 lbs.
Soya Lecithin	3.5 lbs.
Xylene	256 lbs.
Uformite MM55	65 lbs.

CONTAINERS: 5 gallons or smaller.

RECEIVING
INSPECTION:

Immerse De Vilbiss QS 139-1 propeller and shaft in the paint. The shaft should be vertical and centered in the can with the blade six (6) inches from the bottom of the can. Set speed of propeller at 670 rpm using a strobe light, running in reverse, mix for five (5) minutes. Paint viscosity should be 23 to 32 seconds as determined using a #4 Ford cup.

USE:

Stir well before taking from container and before using. Spray at viscosity of 25 seconds on Ford #4 Viscosimeter having #4 size orifice. Cover all of sprayed surfaces well. Stir rapidly in order to obtain this viscosity.

STORING:

Use oldest material up first. Keep tightly covered.

NOTE:

Containers must have snap or screw on cover for ease of sampling paint for test.

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. IA0000819110		Manifest Document No. 48171		2. Page 1 of 1		Information in the shaded areas is not required by Federal law.					
3. Generator's Name and Mailing Address SQUARE D CO ATTN MAINT, 3700-6th St SW CEDAR RAPIDS, IA 52406 52404						A. State Manifest Document Number							
4. Generator's Phone (319) 365-4631						B. State Generator's ID							
5. Transporter 1 Company Name SAFETY-KLEEN-CORP.			6. US EPA ID Number IA0098027592			C. State Transporter's ID							
7. Transporter 2 Company Name			8. US EPA ID Number			D. Transporter's Phone: 319/3863026							
9. Designated Facility Name and Site Address SAFETY-KLEEN CORP. 3035 WEST 73RD STREET DAVENPORT, IA 52806			10. US EPA ID Number IA0098027592			E. State-Transporter's ID							
						F. Transporter's Phone							
						G. State Facility's ID							
						H. Facility's Phone 319/3863026							
11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)						12. Containers		13. Total Quantity		14. Unit Wt/Vol		15. Waste No.	
a. <input checked="" type="checkbox"/> WASTE, PETROLEUM NAPHTHA, CUMBUSTIBLE LIQUID, UN 1255 0001						18 DM		600		P		0001	
b. WASTE, COMPOUND, CLEANING, LIQUID, CORROSIVE MATERIAL, NA 1760 F002-F004						DM						F002	
c. WASTE, PERCHLOROETHYLENE, ORM-A, UN 1897 F002						DM							
d. 													
J. Additional Descriptions for Materials Listed Above						K. Handling Codes for Wastes Listed Above							
15. Special Handling Instructions and Additional Information 5-047-01-3360 148171 6PT + 148172 TERR 0108													
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. Unless I am a small quantity generator who has been exempted by statute or regulation from the duty to make a waste minimization certification under Section 3002(b) of RCRA, I also certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and I have selected the method of treatment, storage or disposal currently available to me which minimizes the present and future threat to human health and the environment.										Date			
Printed/Typed Name PHILIP W. NELSON					Signature <i>Philip W. Nelson</i>					Month Day Year 4 30 86			
17. Transporter 1 Acknowledgement of Receipt of Materials										Date			
Printed/Typed Name MARVIN HENNINGSEN					Signature <i>Marvin Henningsen</i>					Month Day Year 4 30 86			
18. Transporter 2 Acknowledgement of Receipt of Materials										Date			
Printed/Typed Name					Signature					Month Day Year			
19. Discrepancy Indication Space #12 a. is 11. - Please pick up street address													
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.										Date			
Printed/Typed Name Martha B. Fruehling					Signature <i>Martha B. Fruehling</i>					Month Day Year 4 30 86			

ORIGINAL-RETURN TO GENERATOR

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.
I. A. D. O. O. O. 8. 1. 9. 1. 1. 0

Manifest Document No.
0. 4. 3

2. Page 1 of 1

Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
Square D Company
3700 Sixth Street, S.W.
Cedar Rapids, Iowa 52406

4. Generator's Phone (319) 365-4631

5. Transporter 1 Company Name Milwaukee, WI
Hydrite Chemical Company

6. US EPA ID Number
W. I. D. O. O. 6. 4. 3. 5. 8. 8. 7

7. Transporter 2 Company Name

8. US EPA ID Number

9. Designated Facility Name and Site Address
Hydrite Chemical Company
2815 WC F&N Drive
Waterloo, Iowa 50703

10. US EPA ID Number

I. A. T. 2. 0. 0. 0. 1. 0. 5. 9. 3

A. State Manifest Document Number

1315

B. State Generator's ID

C. State Transporter's ID

D. Transporter's Phone (314) 257-2500

E. State Transporter's ID

F. Transporter's Phone

G. State Facility's ID

H. Facility's Phone

319-232-9731

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)

12. Containers
No. Type

13. Total
Quantity

14. Unit
Wt/Vol

1. Waste No.

HM

a. Waste Xylene Flammable Liquid UN-1307

0.03 D.M. 0.0165 P F003

b. Waste I,I,I Trichloroethane ORM-A UN-2831

0.06 D.M. 0.0330 P E002

c.

d.

J. Additional Descriptions for Materials Listed Above

Auth. # A. 1492-G 3222-84
B. 1491-G 3221-01

K. Handling Codes for Wastes Listed Above

15. Special Handling Instructions and Additional Information

AVOID INHALATION AND INGESTION

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.

Unless I am a small quantity generator who has been exempted by statute or regulation from the duty to make a waste minimization certification under Section 3002(b) of RCRA, I also certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and I have selected the method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment.

Printed/Typed Name

Richard R. Kelly

Signature

Richard R. Kelly

Month Day Year

10/1/86

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name

Randy W. Reinard

Signature

Randy W. Reinard

Month Day Year

10/1/86

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name

Signature

Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name

EARNIE ZIERKE

Signature

Earnie Zierke

Month Day Year

10/1/86

ORIGINAL - RETURN TO GENERATOR



Please print or type.

(Form designed for use on elite (12-pitch) typewriter.)

EPA Form 8700-22 (3-84)

Form Approved. OMB No. 2000-0404. Expires 7-31-86

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. IAD000819110	Manifest Document No. 040	2. Page 1 of 1	Information in the shaded areas is not required by Federal law, but is required by Illinois law.	
3. Generator's Name and Mailing Address SQUARE D COMPANY 3700 SIXTH STREET, S.W. CEDAR RAPIDS, IOWA 52404						
4. Generator's Phone (319) 365-4631						
5. Transporter 1 Company Name PEORIA DISPOSAL COMPANY		6. US EPA ID Number ILD009848193		7. Transporter 1 Phone 317-574-3175		
7. Transporter 2 Company Name		8. US EPA ID Number		9. Transporter 2 Phone		
9. Designated Facility Name and Site Address PEORIA DISPOSAL COMPANY LANDFILL 4349 SOUTHPORT ROAD PEORIA, ILLINOIS 61615		10. US EPA ID Number ILD000805812		11. Facility Phone 309-676-4893		
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)		12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	15. Waste No.
a. <input checked="" type="checkbox"/> HM METAL HYDROXIDE ORM-E HAZARDOUS WASTE, SOLID NOS NA 9189		009	B G	10	2	EPA HW Number 831088
b.						EPA HW Number 831088
c.						EPA HW Number 831088
d.						EPA HW Number 831088
16. Additional Descriptions for Materials Listed Above		17. Handling Codes for Wastes Listed Above				
18. Special Handling Instructions and Additional Information I also certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable. TAKE CARE NOT TO INGEST SLUDGE						
19. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations, and Illinois regulations.						
Printed/Typed Name Richard R. Kelly		Signature <i>Richard R. Kelly</i>		Date 01/03/86		
17. Transporter 1 Acknowledgement of Receipt of Materials		Date				
Printed/Typed Name Richard Rudloff		Signature <i>Richard Rudloff</i>		Month Day Year 01/03/86		
18. Transporter 2 Acknowledgement or Receipt of Materials		Date				
Printed/Typed Name		Signature		Month Day Year		
19. Discrepancy Indication Space Generator was notified of correction to Box 13, total quantity, should read "10." (ls 1-6-86)						
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.						
Printed/Typed Name James Douglas		Signature <i>James Douglas</i>		Date 01/03/86		

STATE OF CONNECTICUT
DEPARTMENT OF ENVIRONMENTAL PROTECTION
Hazardous Waste MANIFEST SECTION, State Office Building, Hartford, CT 06106



Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. I.A.D.O.O.O.8.1.9.1.1.0		Manifest Document No. 0.4.1		2. Page 1 of 1		Information in the shaded areas is not required by Federal law, but may be required by State law.	
3. Generator's Name and Mailing Address SQUARE D COMPANY 3700 SIXTH STREET, S.W. CEDAR RAPIDS, IOWA 52404		4. Generator's Phone 319 365-4631		6. US EPA ID Number I.L.D.O.3.9.4.1.4.4.7.7		7. Transporter 1 Company Name FIN, INC.		A. State Manifest Document Number 0073821	
7. Transporter 2 Company Name INDIAN HEAD TRUCKLINE		8. US EPA ID Number M.N.D.O.O.6.9.6.3.3.8		9. Designated Facility Name and Site Address HANDY & HARRISON 1770 KINGS HIGHWAY FAIRFIELD, CONNECTICUT 06430		10. US EPA ID Number CT D O 1.8.6.5.6.8.1.9		B. State Manifest Document Number 0073821	
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number) a. SPENT SULFURIC ACID SOLUTION CORROSIVE MATERIAL (SILVER SOLUTION) UN1830		12. Containers No. Type 004 D-M		13. Total Quantity 00229 GL		14. Unit Wt/Vol GL		I. Waste No. B-902	
J. Additional Description for Materials Listed Above a. DANGER 1 CORROSIVE b. STRONG OXIDIZER c. CAUSES SEVERE BURNS d. CONTACT WITH OTHER MATERIAL MAY CAUSE FIRE.		K. Handling Codes for Waste Listed Above TO4 PRECIOUS METALS RECLAMATION		15. Special Handling Instructions and Additional Information I also certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable.					
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations, and all applicable State laws and regulations.		Printed/Typed Name RICHARD R KELLY		Signature <i>Richard R Kelly</i>		Date 0.12.9.86			
17. Transporter 1 Acknowledgement of Receipt of Materials		Printed/Typed Name NEAL DEAN		Signature <i>Neal Dean</i>		Date 01.29.86			
18. Transporter 2 Acknowledgement of Receipt of Materials		Printed/Typed Name EDWARD Wschola		Signature <i>Edward Wschola</i>		Date 02.03.86			
19. Discrepancy Indication Space SECT D. SAME, H. 203-259-8321, K. TO4 PRECIOUS METALS RECLAMATION B. SAME, SECT. 14-G RECD WITHOUT WASTE MINUTIZATION CERTIFICATION									
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.		Printed/Typed Name Joseph Gibbons		Signature <i>Joseph Gibbons</i>		Date 02.04.86			

COPY 3: GENERATOR COMPLETED COPY

CT A 0073821

GENERATOR

TRANSPORTER

FACILITY

HAZARDOUS WASTE MANIFEST LOG

Manifest Document Number	Date Shipped	Description	Quantity	Transporter	Disposal Facility	Date Acknowledgement Received
011076	9/16/85	Waste Petroleum Naphtha	9 DM	Safety Kleen	Safety Kleen	9/19/85
9334941101 L# 1382732	9/16/85	Waste Petroleum Naphtha	9 DM	Safety Kleen	Safety Kleen	9/19
1508-001-037	9/20/85	Hazardous Waste Solid NOS NA 9189	6 Bags	Peoria Disposal	Peoria Disposal	10/7/85
L# 1313 1508-001-38	10/3/85	Waste Xylol	4 DM	HYDRITE CHEM.	HYDRITE CHEM.	10/7/85
2068413360	10/17/85	Waste Petroleum Naphtha	10 DM	Safety Kleen	Safety Kleen	10/25/85
4808673360	11/1/85	Waste Petroleum Naphtha	3 DM	Safety Kleen	Safety Kleen	11/18/85
4808663360	11/1/85	Waste Petroleum Naphtha	7 DM	Safety Kleen	Safety Kleen	11/18/85
1508-001-039	12/5/85	Waste Xylol Waste 111 Trichloroethane	3 DM 4 DM	Hydrite Chem	Hydrite Chem.	12/16/85
7574563360	12/10/85	Waste Petroleum Naphtha	10 DM	Safety Kleen	Safety Kleen	12/16/85
6878073360 L# 1382731	12/10/85	Waste Petroleum Naphtha	1 DM	Safety Kleen	Safety Kleen	12/16/85
1508-001-040	1/3/86	Hazardous Waste Solid NOS NA 9189	9 Bags	Peoria Disposal	Peoria Disposal	1/20/86
0365063360	1/6/86	Waste Petroleum Naphtha	4 DM	Safety Kleen	Safety Kleen	1/9/86

HAZARDOUS WASTE MANIFEST LOG

Manifest Document Number	Date Shipped	Description	Quantity	Transporter	Disposal Facility	Date Acknowledgement Received
0365053360	1/6/86	Waste Petroleum Naphtha	7 DM	Safety Kleen	Safety Kleen	1/9/86
IL 1382733 1508-001-041	1/29/86	Spent Sulfuric Acid Solution Corrosive Material Silver Solution 441870	4 DM	FIW	HANCO & Harmon Amesbury Chem. Refining	2/11/86
3153493360	1/31/86	Waste Petroleum Naphtha	3 DM	Safety Kleen	Safety Kleen	2/18/86
3153483360	1/31/86	Waste Petroleum Naphtha	7 DM	Safety Kleen	Safety Kleen	2/18/86
75833360	2/6/86	Waste Petroleum Naphtha	2 DM	Safety Kleen	Safety Kleen	2/10/86
5896933360	2/28/86	Waste Petroleum Naphtha	7 DM	Safety Kleen	Safety Kleen	3/7/86
5896943360	2/28/86	Waste Petroleum Naphtha	4 DM	Safety Kleen	Safety Kleen	3/7/86
7317863360	3/13/86	Waste Petroleum Naphtha	11 DM	Safety Kleen	Safety Kleen	3/26/86
IL 1382731 1508-001-042	4/2/86	Hazardous Waste Solid NCS NA 9189	8 BG	Peoria Disposal	Peoria Disposal	4/10/86
867302	3/31/86	Waste Petroleum Naphtha	10 DM	Safety Kleen	Safety Kleen	4/7/86
1508-001-043	4/10/86	Waste XYLENE Waste III Trichloroethane	3 DM 6 DM	HYDRITE CHEM	HYDRITE CHEM	4/18/86
48171	4/30/86	Waste Petroleum Naphtha	10 DM	Safety Kleen	Safety Kleen	5/5/86

PART I

PERSONNEL TRAINING PLAN

PERSONNEL TRAINING PLAN

I. General Hazardous Waste Training

- A. EPA coordinators, all supervisors and all employees working in areas that generate hazardous waste will complete a hazardous waste management training course. Annual training will include the following as necessary:**
 - 1. Familiarization with the definition of hazardous waste;
 - 2. Basic elements of a hazardous waste management system;
 - 3. Standards for Generators;
 - 4. Overview of Determinations;
 - 5. Packaging, Labeling and Marking;
 - 6. Record keeping and Reporting; and
 - 7. Inspections.
- B. The above training will be presented by the EPA Coordinator. However, plans for training shall be organized so that any supervisor would be able to provide training for employees in his/her work area.**

II. Familiarization with Plant Hazardous Waste Contingency Plan and Emergency Equipment.

- A. All personnel will be familiar with the Square D Company Hazardous Waste Contingency Plan and will know how to respond to an emergency situation.**
- B. Annual training shall include the following as deemed necessary:**
 - 1. Familiarization with plant emergency coordinators;
 - 2. Potential emergency situation that could require implementation of the plan;
 - 3. Non-acute proceedings;
 - 4. Acute proceedings;
 - 5. Overview of emergency equipment; and
 - 6. Evacuation procedures.
- C. The above training will be presented by the EPA coordinator to all supervisors. The supervisors will present this information to the employees in their department. (The EPA coordinator will train employees when necessary.)**

III. Specific Training

A. Plant Engineering

1. Familiarization with hazardous waste regulations so they can handle any situation when the EPA coordinator is not on duty.
2. Familiarization with hazardous waste contingency plan so that they could handle any situation requiring implementation of the contingency plan.

B. Custodial

1. Familiarization with handling of hazardous waste by "on hand" training.
2. Familiarization with DOT requirements.

C. Emergency Personnel

1. Complete familiarization with contingency plan.
2. Familiarization of contingency plan implementation.
3. Use of specific personnel protective equipment.
4. Use of emergency equipment.
5. Clean up of spills.

IV. Records

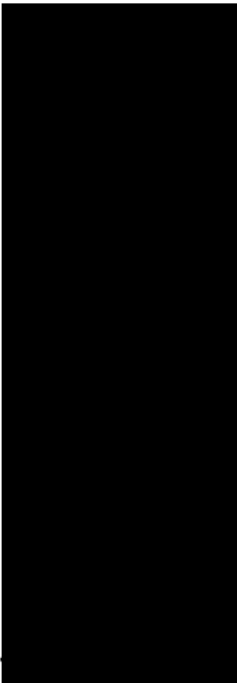
A. The EPA coordinator will maintain the following documents and records at the facility:

1. Job titles for those employees that handle or generate hazardous waste, and the name of each employee filling the job;
2. Written job descriptions for those positions;
3. A written description of the type and amount of training or job experience required that has been given to and completed by personnel described in one (1) above;
4. Records that document that the training has been given to facility personnel; and
5. Records that document training of all personnel on the contingency plan implementation.

● TRAINING MEETING ●

Subject: Chlorine

10/23/85

NAME	Clock #	Job Description
Doris McCorkle		B.F.W.
Carol Walsh		S+R
DAVE Umbdenstock		S+R
NANCY KROTZ		Laborer
KEVIN MESKIMEN		S+R
Jeff Jasper		Elect. Maint
Judy Sand		Deer
T. Michaelson		Laborer
M. J. Kimble		Will Wright
Joyce Galsky		Shipping

EX. 6 PII

Chorine

7 AM ● 10/23/85

EX. 6 PH

Gary Stockton
Galen Parrow
Bob Davis
J. LASAVER
Geanne Woods
Mel Kummerfeldt
Katter C. Jensen
Jenny Kayler
Russell Wickens
Harry Brown
Terry Beren

Ernie Janes

J. Len F. Ingelberg

Charles Longo

Wm. Lewis

Marshall Stuefer

Harold Wischmeyer

Doug Schoedyn

Marta Crawford

Dwaine Van Fleet

Howard Keyler

Sam Holloway

Ray V. Peterson

Reg. Prohaska

in June

Oat Pavers-

Terri Williams

Electronic Maint.

Shipping

Shipping

1909

Maint

plating
Maint

Maint.

B.F.W.

Maint.

Maint.

Maint.

Maint

Maint

Maint

Maint.

Saloner

Saloner

Shipping

Shipping

Shipping

Shipping

Shipping

Shipping

Shipping

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1985 (cont.)

This report is for the calendar year ending December 31, 1985

XV. GENERATOR'S EPA I.D. NO.

T/A/C

I A D 0 0 0 8 1 9 1 1 0

1 2

13 14 15

XVI. WASTE MINIMIZATION (narrative description)

- I. Projects Completed:
- A) Removal of silver from the silver rinse water.
 - 1) Silver removed by electro plating.
 - 2) Silver removed by Ion exchange.
 - 3) Analysis show our silver content at .04ppm in the discharge water and 18ppm in the sludge.
- II. Projects In Progress:
- A) Wastesaver unit (Evaporator Unit)
 - 1) Was a capital purchase in 1985.
 - 2) Unit was installed in late 1985.
 - 3) We have trained personnel how to operate the unit in January 1986.
 - 4) Unit went into complete operations on February 10, 1986.
 - 5) Wastesaver makes the nickel plating line a closed loop system.
 - a) Removes nickel from waste treatment by having the nickel rinse go to the unit.
 - b) The sludge will have less nickel in it due to the reduction of nickel to treat.
 - c) The amount of sludge is reduced by not having nickel to treat.
 - 6) Results
 - a) We estimate a 1/3 reduction in the sludge due to using the unit on the nickel line.
 - b) The toxicity of the sludge will be reduced due to the reduction of nickel. Results will be seen by doing analysis of the sludge in 1986-87.
- III. Projects Planned
- A) Investigate method to increase hold times over the baths to reduce drag out.
 - B) Investigate less toxic plating baths and cleaners.
 - 1) Non-cyanide silver plating bath.
 - 2) Low-cyanide silver plating bath
 - 3) Acid salts
 - 4) Less toxic soaps
 - C) Investigate equipment to make other plating lines a closed loop system.
 - 1) Evaporator units for silver and zinc plating lines.
 - 2) Filter systems.
 - 3) Reverse Osmosis
 - 4) Ion exchange
 - D) Investigate the elimination of or the reduction in processes that generate hazardous waste.
 - 1) Silver strip operation
 - 2) Paint operation
 - 3) Vapor degreasing

RCRA INSPECTION REPORT - GENERATOR ONLY

I. General Information:

(A) Facility Name: Square D Company
 (B) Street: 3700 Sixth St. S.W.
 (C) City: Cedar Rapids (D) State: IA (E) Zip Code: 52401
 (F) Phone: 319-365-4631 (G) County: Linn

(H) Operator: Carl Ashley, Plant manager
 (I) Street: same as above
 (J) City: _____ (K) State: _____ (L) Zip Code: _____
 (M) Phone: _____ (N) County: _____

(O) Owner: Sqaare D Company
 (P) Street: _____
 (Q) City: _____ (R) State: _____ (S) Zip Code: _____
 (T) Phone: _____ (U) County: _____

(V) Type of Ownership: ☒ Federal ☐ Municipal ☒ Private
☐ State ☐ County

(W) Date of Inspection: 5/22/86 (Q) Time of Inspection (From) 8:30 (To) 1:00

(X) Weather Conditions: Partly Cloudy, 75°F, Wind N.W. 5-10 mph

(Y) Person(s) Interviewed

Jim Jensen

Dick Kelly

Kyle Chown

Title

Environmental Coordinator

Traffic Mgr.

Plant Supt.

Telephone

(Z) Inspection Participants

(4) Cont'd

Carl Ashley

Phil Nelson

Title

Plant Mgr.

Loss Control Supv.

Telephone

II. Description of Site Activity

(A) ☒ Generator

(B) ☐ Transporter

(C) ☐ Chemical, Physical
and Biological Treatment

(D) ☐ Storage

(E) ☐ Landfill

(F) ☐ Incineration

(G) ☐ Land Treatment

(H) ☐ Thermal Treatment

(I) Comments:

Yes

No

Not
Inspected

(J) Has this facility
submitted a Part A
Permit Application?

☒

☐

☐

**RCRA COMPLIANCE INSPECTION REPORT
GENERATORS CHECKLIST**

Section A - EPA Identification No.

262.12

1. Does Generator have EPA I.D. No.?

☒ Yes ☐ Noa. If yes, EPA I.D. No. IA00000819110

Section B - Manifest

262.20

1. Does generator ship waste off-site?

☒ Yes ☐ No

a. If no, do not fill out Sections B and D.

b. If yes, identify primary off-site facility(s) Use narrative explanations sheet.)

Safety-Kleen, Hydrite Chem Co.
Peoria Disposal Co., Handy & Harmon

262.20

2. Does generator use Manifest?

☒ Yes ☐ No

a. If no, is generator a small quantity generator?

☐ Yes ☐ No

1. If yes, does generator indicate this when sending waste to a T/S/D facility?

☐ Yes ☐ No

262.21

b. If yes, does manifest include the following information?

1. Manifest Document No.

☐ Yes ☒ Nonot a 5 digit no.

2. Generators Name, Mailing Address, Telephone No.

☒ Yes ☐ No

3. Generator EPA I.D. No.

☒ Yes ☐ No

4. Transporter(s) Name and EPA I.D. No.

☒ Yes ☐ No

5. a. Facility Name, Address and & EPA I.D. No.

☒ Yes ☐ No

b. Alternate Facility Name, Address and EPA ID NO.

☐ Yes ☒ No

c. Instructions to return to generator if undeliverable?

☐ Yes ☒ No

6. Waste information required by DOT - Shipping name, quantity, (weight, or vol.) containers (type and number.)

☒ Yes ☐ No7. Emergency Information (optional)
(special handling instructions, phone no.)☒ Yes ☐ No

- (8) Is the following certification on each manifest form?

☒ Yes ☐ No

This is to certify that the above named materials are properly classified, described, packaged, marked and labeled and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the EPA.

- (9) Does Generator retain copies of Manifests?

☒ Yes ☐ No

If yes, complete a through e.

- a. (1) Did generator sign and date all manifests? ☒ Yes ☐ No
 (2) Who signed for generator? Name Richard Kelly Title Traffic Mgr.
- b. (1) Did generator obtain handwritten signature and date of acceptance from initial transporter? ☒ Yes ☐ No
 (2) Who signed and dated for transporter? Name see manifest copies Title see manifest copies
- c. Does generator retain one copy of manifest signed by generator and transporter? ☒ Yes ☐ No
- d. Do returned copies of manifest include facility owner/operator signature and date of acceptance? ☒ Yes ☐ No
- e. Does generator retain copies for 3 years? (forever) ☒ Yes ☐ No

Section C - Hazardous Waste Determination

1. Does generator generate solid waste(s) listed in Subpart D (List of Hazardous Waste)? ☒ Yes ☐ No
- a. If yes, list wastes and quantities 1,1,1 trichloroethane, F002, 110 gal/yr.
(include EPA Hazardous Waste No.) xylene, F003, 165 gal/yr.
ink waste, F003, 110 gal/yr. wastewater treatment hydroxide sludge, F006, 10 yd³/yr.
2. Does generator generate solid waste(s) that exhibit hazardous characteristics? (corrosivity, ignitability, reactivity, EP toxicity) ☒ Yes ☐ No
- a. If yes, list wastes and quantities wastewater treatment spirits, D001, 600 lb/2wk.
(include EPA Hazardous Waste No.)
- b. Does generator determine characteristics by testing or by applying knowledge of processes? testing & applying knowledge
1. If determined by testing, did generator use test methods in Part 261, Subpart C (or Equivalent)? ☒ Yes ☐ No
- a. If equivalent test methods used, attach copy of equivalent methods used.

262.11

3. Are there any other solid wastes generated by generators? ☒ Yes ☐ Noa. If yes, did generator test all wastes to determine non-hazardous characteristics? ☐ Yes ☒ No

1. If no, list wastes and quantities deemed non-hazardous or processes from which non-hazardous waste was produced? (Use additional sheet if necessary.)

Paint filters from 2 spray booths not tested. Paint thinned with xylene, appears to be flat black. Paint formulation does not indicate any heavy metal pigment.

Section D - Pre-Transport Requirements

262.30

1. Does Generator package waste in accordance with 49 CFR 173 178, and 179? (DOT requirements) ☒ Yes ☐ No2. a. Are containers to be shipped leaking or corroding? ☐ Yes ☒ No
b. Use sheet to describe containers and condition.
c. Is there evidence of heat generation from incompatible wastes in the containers? ☐ Yes ☒ No

262.31

3. Does the generator use DOT labeling requirements in accordance with 49 CFR 172? ☒ Yes ☐ No

262.32

4. Does the generator mark each package in accordance with 49 CFR 172? ☒ Yes ☐ No

262.33

5. Is each container of 110 gallons or less marked with the following label? ☒ Yes ☐ No

Label saying: HAZARDOUS WASTE - Federal Law Prohibits Improper Disposal. If found, contact the nearest police or public safety authority or the U.S. Environmental Protection Agency.

Generator's Name and Address _____

Manifest Document Number _____

262.33

6. Does generator have placards to offer to transporters? ☒ N/A ☐ Yes ☐ No

262.34

7. Accumulation Time

a. Are containers or tanks used to store hazardous waste on-site for 90 days or less prior to transporting off-site? (If yes, complete Sections 6, H & I) ☒ Yes ☐ No1. If yes, is each container or tank clearly marked or labeled with the date upon which each period of accumulation begins? ☒ Yes ☐ No2. Are the containers or tanks clearly marked or labeled with the words "Hazardous Waste"? ☒ Yes ☐ No

b. If the generator accumulates hazardous wastes for more than 90 days, has he been granted an extension by proper authority? ☐ Yes ☐ No

1. If yes, is the extension for more than 30 days? ☐ Yes ☐ No

2. If no extension has been granted, the generator is an operator of a storage facility and is subject to the requirements of a TSD Facility. (Complete Facility Checklist)

Section E - Recordkeeping and Records

1. Does generator keep the following reports for 3 years?

- a. Manifests and signed copies from designated facilities?
- b. Annual reports
- c. Exception Reports
- d. Test results

☒ Yes ☐ No
☒ Yes ☐ No
☒ Yes ☐ No
☒ Yes ☐ No

2. Where are records kept (at facility or elsewhere)?

3. Who is in charge of keeping the records? Name _____ Title _____

Section F - Special Conditions

Has generator received from or transported to a foreign source any hazardous waste?

☐ Yes ☒ No

a. If yes, has he filed a notice with the Regional Administrator?

☐ Yes ☐ No

b. Is this waste manifested and signed by Foreign consignee?

☐ Yes ☐ No

c. If generator transported wastes out of the country has he received confirmation of delivered shipment?

☐ Yes ☐ No

Section G - Preparedness and Prevention

1. Is there evidence of fire, explosion or contamination of the environment?

☐ Yes ☒ No

If yes, use narrative explanations sheet to explain.

2. Is the facility equipped with

A. Internal communication or alarm system?

☒ Yes ☐ No

(1) Is it easily accessible in case of emergency?

☒ Yes ☐ No

B. Telephone or two-way radio to call emergency response personnel?

☒ Yes ☐ No

C. Portable fire extinguishers, fire control equipment spill control equipment and decontamination equipment?

☒ Yes ☐ No

(1) Is this equipment tested to assure its proper operation?

☒ Yes ☐ No

D. Water of adequate volume for hoses, sprinklers or water spray system?

☒ Yes ☐ No

(1) Describe source of water water tower (tank) filled w city water

3. Is there sufficient aisle space to allow unobstructed movement of personnel and equipment?

☒ Yes ☐ No

4. Has the owner/operator made arrangements with the local authorities to familiarize them with characteristics of the facility? (layout of facility, properties of hazardous waste handled and associated hazards, places where facility personnel would normally be working, entrances to roads inside facility, possible evacuation routes.)

☒ Yes ☐ No

5. In the case that more than one police and fire department might respond, is there a designated primary authority?
a. If yes, list primary authority

N/A ☐ Yes ☐ No

6. Does the owner/operator have phone numbers of and agreements with State emergency response teams, emergency response contractors and equipment suppliers?
Are they readily available to all personnel?

☒ Yes ☐ No
☐ Yes ☐ No

7. Has the owner/operator arranged to familiarize local hospitals with the properties of hazardous waste handled and types of injuries that could result from fires, explosions, or releases at the facility?

have company doctor with own clinic
☒ Yes ☐ No

8. If State or local authorities decline to enter, ^{int. such agreements,} is this entered in the operating record?

N/A ☐ Yes ☐ No

Section H - Contingency Plan and Emergency Procedures

1. Is a contingency plan maintained at the facility?

☒ Yes ☐ No

a. If yes, is it a revised SPCC Plan?

☐ Yes ☒ No

2. Is there an emergency coordinator on site at all times?

☒ Yes ☐ No

Section I - Personnel Training

265.16

Does the owner/operator maintain Personnel Training
Records at the facility?
How long are they kept? _____

: ☒ Yes ___ No

If yes, do they include:

(1) Job title and written job description of each
position? _____

☒ Yes ___ No

but does not include names of people in jobs

(2) Description of type and amount of training? _____

☒ Yes ___ No

(3) Records of training given to facility personnel? _____

☒ Yes ___ No

NOTE: If containers are used, fill out checklist for containers.
If tanks are used, fill out checklist for tanks (Items 5b & c are
not applicable)

Describe accumulation or storage area. Use photos and narrative
explanation.

*Waste xylene & cad cam ink waste is stored in flammables room
Has access control. Appears neat & clean.
Waste shreds - stored in super sacks in "bowling alley" warehouse
One sack of shreds accumulating under filter press.*

Inspection file No: _____

Name of Facility: Square D CompanyAddress: 3700 6th St. S.W.Cedar Rapids IA 52406EPA Generator ID Number: IA0000819110Facility Inspection Representative: Jim Jensen

Title: _____

Telephone Number: _____

Reviewer: _____

Date Reviewed: _____

Form "1"

The questions contained in this checklist apply to owners and operators of all hazardous waste facilities that store containers of hazardous waste, except as Section 265.1 provides otherwise.

Part. Regs.
40 C.F.R.
Part:

- | | | | |
|------------------------|---|------------|-----------|
| 265.171 | 1. Are all containers in good condition, i.e., not showing signs of leakage or corrosion or any other deterioration/deformation? | <u>Yes</u> | No |
| 265.171 | 2. Are containers lined or made of materials compatible with hazardous wastes placed into them so that the container will not react or corrode with the hazardous wastes? | <u>Yes</u> | No |
| 265.173(a) | 3. Are all containers holding hazardous waste kept closed during storage? | <u>Yes</u> | No |
| 265.174 | 4. Are areas where hazardous waste containers are stored inspected by the owner/operator at least once a week? | Yes | No |
| 265.15(d)
265.15(b) | 5. Is an inspection log maintained? (See question #5 of TSD checklist.) | Yes | No |
| 265.176 | 6. Are containers holding ignitable or reactive waste located at least 50 ft. from the facility's property line? | <u>Yes</u> | No |
| 265.177(a) | 7. Are incompatible wastes placed in the same container? (See Appendix 5 for examples.) | Yes | <u>No</u> |
| 265.177(c) | 8. Are storage containers holding hazardous wastes which are incompatible with nearby materials stored in containers, tanks, piles, or surface impoundments separated by dikes, berms, walls, or other devices? | <u>Yes</u> | No |



1) "Super Sacks" of F006 sludge.



2. label on one sack

